

RECEIVED

2003 JUN 23 P 1:4

STATE OF COLORADO

Revised 02/03

CORRES CONTROL
INCOMING LTR NO

00571 RF03

DUE DATE
ACTION

CORRESPONDENCE
CONTROL

Bill Owens Governor

Douglas H Benevento, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr S
Denver, Colorado 80246-1530
Phone (303) 692 2000
TDD Line (303) 691-7700
Located in Glendale, Colorado

Laboratory Services Division
8100 Lowry Blvd
Denver, Colorado 80230-6928
(303) 692-3090

http://www.cdphe.state.co.us



Colorado Department
of Public Health
and Environment

DIST	LTR	ENC
BERARDINI, J. H.	X	
BOGNAR, E. S.	X	
CROCKETT, G. A.		
DECK, C. A.	X	
DEGENHART, K. R.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
LYLE, J. L.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.		
POWERS, K. P.		
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOH, N. R.		
WILLIAMS, J. L.		

June 13, 2003

Mr Richard DiSalvo, Acting Assistant Manager
Environment and Stewardship
U S Department of Energy, RFEO
10808 Highway 93, Unit A
Golden, CO 80403-8200

Mr Stephen Nesta, Environmental Manager
Remediation, Industrial D&D, & Site Services
Kaiser-Hill Company, L L C
Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B, Building 116
Golden, CO 80403-8200

RE Conditional Approval of Closure Description Document (CDD) for Partial Closure of RCRA Unit 374 3 - the 700 and 800 Area Process Waste Transfer System at the Rocky Flats Environmental Technology Site (RFETS)

Dear Mr DiSalvo and Mr Nesta

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received your notice of intent to partially close RCRA Unit 374 3 and has reviewed the *Closure Description Document (CDD) for the Partial Closure of Unit 374 3 - the 700 and 800 Area Process Waste Transfer System*. The Division received this CDD from DOE and Kaiser-Hill on January 28, 2003 with a cover letter dated January 23, 2003. This CDD applies to portions of Unit 374 3 known as the "700 and 800 Area Process Waste Transfer System" which includes valve vaults 1 through 13 and the associated process waste lines connecting these valve vaults and the process waste lines between these valve vaults to the associated building boundaries.

The components of the RCRA unit described by this CDD will be closed by the method described as "Clean Closure by Decontamination" in Section X (Closure Plan) of the RFETS RCRA Permit No CO-97-05-30-01. In accordance with Permit Condition X B 3 of the RFETS RCRA Permit No CO-97-05-30-01, the Division hereby approves this CDD for the portions of Unit 374 3 known as the "700 and 800 Area Process Waste Transfer System" as described therein, with the following conditions:

- 1 The schedule for the closure activities associated with the 700 Area Process Waste Transfer System must be provided to the Division prior to conducting closure activities on this portion of Unit 374 3
- 2 Prior to conducting decontamination activities on any portion of double-walled piping within the 700 and 800 Area Process Waste Transfer System, the respective pipeline must be evaluated to determine if there have been any known releases from the primary pipeline (i.e., inner pipeline) to the secondary containment pipeline (i.e., outer pipeline) by reviewing documentation and any other known sources of

COR. CONTROL	X	
ADMIN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres Control RFP

6/23/03 By *Bg*

Ref Ltr #

DOE ORDER #

5400 1

DOCUMENT CLASSIFICATION
REVIEW WAIVER PER
CLASSIFICATION OFFICE

ADMIN RECORD
IA-A-001476

Y2

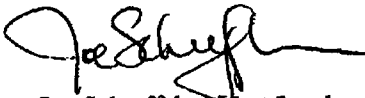
June 13, 2003

such information for the unit. If this evaluation reveals that a release has occurred, then the Division must be notified prior to conducting the work and information must be provided to the Division describing how closure activities will proceed for that portion of the system. If the evaluation determines that no known releases have occurred from the primary pipeline, then closure activities may proceed. However, for each portion of piping being decontaminated, the leak detection system must be visually monitored to determine if the primary pipeline is leaking. If leaks from the primary pipeline are detected, then decontamination activities must stop for that portion of the system and the Division must be notified and provided with plans describing how closure activities will proceed for that portion of the system. Unless otherwise directed by the Division, decontamination activities may recommence within two working days of providing the notification and plans to the Division.

- 3 As stated in an RFETS Regulatory Contact Record dated April 7, 2003 from Steve Nesta of Kaiser-Hill to James Hindman of the Division, the following hazardous waste constituents will need to be included in the list of analytes for which final rinsate will be tested to verify clean closure: cyanides (associated with hazardous waste codes P030, P098, P099, P106), acetonitrile (hazardous waste code U003), dimethyl sulfate (hazardous waste code U103), and 1,4-dioxane (hazardous waste code U108).
- 4 Since this CDD does not include a soil contamination evaluation for the 700 and 800 Area Process Waste Transfer System, it is assumed that soils and possibly groundwater in the vicinity of the unit will be evaluated by ER. Otherwise, the CDD will need to be amended to include a soil contamination evaluation.
- 5 In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division. The certification of closure will need to be signed by the facility and by an independent Colorado registered professional engineer (P.E.) in accordance with the requirements of the approved Closure Plan and Section 264.115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed. Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P.E. will be involved in the closure process to the extent necessary to adequately certify closure.

If you have any questions concerning these matters, please contact James Hindman at (303) 692-3345.

Sincerely,



Joe Schieffelin, Unit Leader
Hazardous Waste Compliance Unit

cc D Maxwell, DOE-RFFO
S Tower, DOE-RFFO
A Rosenman, Kaiser-Hill
D Shelton, Kaiser-Hill
T Rehder, USEPA Region VIII
S Garcia, City of Broomfield
D Miller, AGO
S Gunderson, CDPHE-HMWMD
D Kruckek, CDPHE-HMWMD
S Tarlton, CDPHE-HMWMD
Administrative Record, RFETS Bldg T-130G



2/2